

# **EXHIBIT S**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

*Marinella Hemenway, et al. v. Islamic Republic of Iran*, No. 1:18-cv-12277 (GBD) (SN)

**DECLARATION OF FAMILIAL RELATIONSHIP**

I, Jamielah Persol, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Jamielah Persol, and I was the fiancé and life partner of DaJuan Hodges (“DaJuan”) who died on September 11, 2001 (“9/11”) when the World Trade Center collapsed. I submit this Declaration to demonstrate I was the functional equivalent of DaJuan’s spouse.

2. DaJuan and I started dating in late 1992 and were together continuously until 9/11. We met at work and built a relationship. I got pregnant approximately three months into our relationship and we had a baby girl together. In late 1993 I moved in with DaJuan and his mother in the Morningside Heights area of New York City. DaJuan and I moved into our own apartment in the Bronx with our daughter around 1996 or 1997.

3. DaJuan and I got engaged in Summer 2001. *See* photo of engagement ring attached as Exhibit 1. I was home sick and asked DaJuan to bring me something from the pharmacy, and when I looked inside the pharmacy bag there was a ring. I was so surprised because I did not expect a proposal at that time. We told our friends and family about our engagement and everyone was so excited for us. We spoke about having a courthouse wedding

and a small party with family and friends on Halloween 2001, but unfortunately we never had the opportunity to plan it.

4. As life partners, DaJuan and I both contributed financially to our life together. We shared expenses, including rent, groceries, utilities, and our daughter's expenses. Since DaJuan earned more money, he paid a larger share of our expenses. DaJuan made me a partial beneficiary of either his life insurance or 401k (I cannot recall the specifics after so many years).

5. At the time of DaJuan's death we lived together and shared our lives as husband and wife. We shared dreams, raised our daughter and cared for our dog together, and were the love of each other's lives. *See* photos attached as Exhibit 2. DaJuan was a great father and partner, and I am confident he would have been a great husband had he not been stolen away from me on 9/11. He loved to cook and made me his famous lasagna. He had a great sense of humor and always made me laugh, and our daughter is just like him in that respect. We enjoyed, among other things, going to the movies and taking our daughter to the park and to amusement parks. We planned to go to Disney World and Universal Studios at some point.

6. There is no doubt that DaJuan and I were family. Together we attended family gatherings and celebrated holidays with each other's families. I remember going to DaJuan's mother's house for Christmas and New Year's Eve where we celebrated and spent quality time together as a family. My family loved DaJuan and could not get enough of him. Our families got along very well and were excited to become one after our wedding. Unfortunately, that day never came because of the tragedy of 9/11.

7. After DaJuan passed away, I was the administrator of his estate. *See* Exhibit 3.

8. Upon hearing news of the terrorist attack at the World Trade Center, I prayed DaJuan would be found alive. I did not want to believe the love of my life and my daughter's

father left this world so suddenly and unexpectedly. I eventually had to accept the terrible truth that DaJuan was really gone.

9. When I woke up on September 11, 2001, I never imagined I would never see DaJuan again. After all, DaJuan and I were raising a family together and looked forward to getting married and spending the rest of our lives together. DaJuan was stolen away from me, and I feel his loss every day and share fond memories of him. He is forever in my heart.

10. DaJuan and I shared our lives as committed life partners with the deepest love for one another. We considered each other to be family. Accordingly, I should be deemed the functional equivalent of DaJuan's spouse.

Executed on: 10/30/2021  
Name (Signature): Jamiah Persol

Name (Print): Jamiah Persol

# **EXHIBIT 1**







# **EXHIBIT 2**





















# **EXHIBIT 3**

*MS*  
At a Surrogate's Court held in and for the County of the Bronx, at the Bronx  
County Building, in the Borough of The Bronx, City of New York  
on the 12<sup>th</sup> day of November, 2002

Present, Hon. LEE L. HOLZMAN, Surrogate.

IN THE MATTER OF  
THE APPLICATION FOR LETTERS OF ADMINISTRATION  
UPON THE GOODS, CHATTELS AND CREDITS OF

DAJUAN Hodges,

Deceased.

FILED  
ADMINISTRATION DEPT.  
NOV 12 2002

83-7A 2002  
SURROGATE'S COURT  
COUNTY OF BRONX

Upon reading and filing the petition of Jamie lah Persol

verified the 23<sup>rd</sup> day of October, 2002;  
And her affidavit sworn to on October 21, 2002

IT IS ORDERED AND DECREED, that Letters of Administration upon the Goods, Chattels  
and Credits of the above-named intestate be and the same are hereby awarded to:

Jamie lah Persol

of The City of New York, County of Bronx and State of New York, who appear<sup>S</sup>/to be entitled

thereto, upon her executing a Bond according to law, with sufficient sureties, in the  
penal sum of \_\_\_\_\_ Dollars;  
and said Letters of Administration shall be limited by the restricted powers mentioned  
in SCPA 702(1) as to the cause of action; and

IT IS FURTHER ORDERED that Jamie lah Persol  
in both his/her individual and fiduciary capacity, as well as  
any attorney who represents him/her in either capacity, shall  
not permit the collection or receipt of the proceeds from any  
action instituted or settled pursuant to the authority granted  
by these letters without the further order of this court.

Enter:

22H

Surrogate